

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

CommScope, Inc., CommScope Inc. of) Civil Action No. 19-cv-15962-JXN-
North Carolina, and CommScope) LDW
Technologies, LLC,)
)

Plaintiffs,)
)

v.)
)

Rosenberger Technology (Kunshan))
Co. Ltd., Rosenberger Asia Pacific)
Electronic Co., Ltd., Rosenberger)
Technology LLC, Rosenberger USA)
Corp., Rosenberger North America)
Pennsauken, Inc., Rosenberger Site)
Solutions, LLC, Rosenberger)
Hochfrequenztechnik GmbH & Co.)
KG, Northwest Instrument, Inc., and)
CellMax Technologies AB)
)

Defendants

**CONSOLIDATED INDEX IN
SUPPORT OF JOINT MOTION
TO SEAL COMMSCOPE'S
LETTER REQUEST TO
COMPEL DISCOVERY**

I. Documents *previously sealed* and submitted in connection with CommScope’s Letter Request to Compel Rosenberger to Produce Specific Hardware Discovery (ECF No. 490).

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
CommScope’s Letter Request to Compel Discovery (ECF No. 490): at 25	Subject to the Court’s Sealed Transcript of Proceedings held on April 1, 2021, ECF No. 398. <i>See also</i> Docket, ECF No. 398 (noting transcript is “unavailable for public viewing”).			
CommScope’s Letter Request to Compel Discovery (ECF No. 490): at 27 Exhibit 19 (ECF No. 490-20) to the Declaration of Randall E. Kahnke in Support of CommScope’s Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490-1)	Subject to the Court’s Sealed Transcript of Proceedings held on September 21, 2021, ECF No. 474. <i>See also</i> Docket, ECF No. 474 (noting transcript is “unavailable for public viewing”).			

Exhibit 23 (ECF No. 490-24) to the Declaration of Randall E. Kahnke in Support of CommScope's Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490-1): at 4	
Exhibit 20 to the Declaration of Randall E. Kahnke (ECF No. 490-21)	Subject to the Court's Sealing Order, ECF No. 404, granting Joint Motion to Seal Pursuant to L. Civ. R. 5.3, ECF No. 396-4. <i>See also</i> Consolidated Index in Support of the Joint Motion to Seal, ECF No. 396-1 (moving to seal Materials Submitted with the Parties Joint Submission for the April 1, 2021 Telephone Conference).
Exhibit 21 to the Declaration of Randall E. Kahnke (ECF No. 490-22)	Subject to the Court's Sealing Order, ECF No. 487, granting Joint Motion to Seal Pursuant to L. Civ. R. 5.3, ECF No. 472-8. <i>See also</i> Consolidated Index in Support of the Joint Motion to Seal, ECF No. 472-3 (moving to seal Materials Submitted with CommScope's Motion to Compel Hardware Discovery).

II. Documents submitted in connection with CommScope's Letter Request to Compel Rosenberger to Produce Specific Hardware Discovery (ECF No. 490).

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
CommScope's Letter Request to Compel Discovery (ECF No. 490): at 3 n.3	This portion of the Letter reveals information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's business practices and procedures. (<i>See</i> Declaration of Farid Firouzbakht (" <u>Firouzbakht Decl.</u> ") ¶ 2).	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's business practices and procedures. (Firouzbakht Decl. ¶ 3).	Redacted version of Letter proposed that may be filed publicly.	Defendants do not oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
CommScope's Letter Request to Compel Discovery (ECF No. 490): at 6 n.5	This portion of the Letter reveals discovery information that has been designated Confidential under the Discovery Confidentiality Order (ECF No. 22). (Firouzbakht Decl. ¶ 2).	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal discovery information and requests that have been designated Confidential under the Discovery Confidentiality Order. (Firouzbakht Decl. ¶ 3).	Redacted version of Letter proposed that may be filed publicly.	Defendants do not oppose the motion to seal.
CommScope's Letter Request to Compel Discovery (ECF No. 490): at 7-9, 11-15, 17, 19	These portions of the Letter reveal information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would	Redacted version of Letter proposed that may be filed publicly.	Defendants do not oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
	Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade secrets. (<i>See</i> Firouzbakht Decl. ¶ 2).	reveal confidential and non-public information about CommScope's trade secrets. (Firouzbakht Decl. ¶ 3).		
Declaration of Randall E. Kahnke (ECF No. 490-1) in Support of CommScope's Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490)	This Declaration reveals information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade secrets. (<i>See</i>	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's trade secrets. (Firouzbakht Decl. ¶ 3).	Redacted version of Declaration proposed that may be filed publicly.	Defendants do not oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
	Firouzbakht Decl. ¶ 2).			
Exhibit 1 (ECF No. 490-2) to the Declaration of Randall E. Kahnke in Support of CommScope's Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490-1)	This Exhibit reveals discovery information that has been designated Confidential under the Discovery Confidentiality Order (ECF No. 22). (Firouzbakht Decl. ¶ 2).	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal discovery information and requests that have been designated Confidential under the Discovery Confidentiality Order. (Firouzbakht Decl. ¶ 3).	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	Defendants do not oppose the motion to seal.
Exhibit 4 (ECF No. 490-5) to the Declaration of Randall E. Kahnke in Support of	This Exhibit reveals discovery information that has been designated Confidential under the	Disclosure of this information would cause clearly defined and serious injury to	The confidential information in this document is sufficiently pervasive so as to	Defendants do not oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
CommScope's Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490-1)	Discovery Confidentiality Order (ECF No. 22). (Firouzbakht Decl. ¶ 2).	CommScope because it would reveal discovery information and requests that have been designated Confidential under the Discovery Confidentiality Order. (Firouzbakht Decl. ¶ 3).	render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	
Exhibit 5 (ECF No. 490-6) to the Declaration of Randall E. Kahnke in Support of CommScope's Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490-1)	This Exhibit reveals information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's trade secrets.	Redacted version of Exhibit proposed that may be filed publicly.	Defendants do not oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
	secrets. (<i>See</i> Firouzbakht Decl. ¶ 2).	(Firouzbakht Decl. ¶ 3).		
Exhibit 6 (ECF No. 490-7) to the Declaration of Randall E. Kahnke in Support of CommScope's Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490-1)	This Exhibit reveals information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade secrets. (<i>See</i> Firouzbakht Decl. ¶ 2).	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's trade secrets. (Firouzbakht Decl. ¶ 3).	Redacted version of Exhibit proposed that may be filed publicly.	Defendants do not oppose the motion to seal.
Exhibit 7 (ECF No. 490-8) to the Declaration of Randall E. Kahnke in Support of	This Exhibit reveals information that has been designated Confidential and/or Attorneys' Eyes Only	Disclosure of this information would cause clearly defined and serious injury to	Redacted version of Exhibit proposed that may be filed publicly.	Defendants do not oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
CommScope's Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490-1)	under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade secrets. (<i>See</i> Firouzbakht Decl. ¶ 2).	CommScope because it would reveal confidential and non-public information about CommScope's trade secrets. (Firouzbakht Decl. ¶ 3).		
Exhibit 8 (ECF No. 490-9) to the Declaration of Randall E. Kahnke in Support of CommScope's Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490-1)	This Exhibit reveals information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade secrets. (<i>See</i>	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's trade secrets.	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial	Defendants do not oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
	Firouzbakht Decl. ¶ 2).	(Firouzbakht Decl. ¶ 3).	risk of competitive injury.	
Exhibit 9 (ECF No. 490-10) to the Declaration of Randall E. Kahnke in Support of CommScope's Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490-11)	This Exhibit reveals information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's business practices and procedures. (<i>See</i> Firouzbakht Decl. ¶ 2).	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's business practices and procedures. (Firouzbakht Decl. ¶ 3).	Redacted version of Exhibit proposed that may be filed publicly.	Defendants do not oppose the motion to seal.
Exhibit 10 (ECF No. 490-11) to the Declaration of Randall E. Kahnke in Support of	This Exhibit reveals information that has been designated Confidential and/or Attorneys' Eyes Only	Disclosure of this information would cause clearly defined and serious injury to	Redacted version of Exhibit proposed that may be filed publicly.	Defendants do not oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
CommScope's Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490-1)	under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade secrets. (<i>See</i> Firouzbakht Decl. ¶ 2).	CommScope because it would reveal confidential and non-public information about CommScope's trade secrets. (Firouzbakht Decl. ¶ 3).		
Exhibit 11 (ECF No. 490-12) to the Declaration of Randall E. Kahnke in Support of CommScope's Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490-1)	This Exhibit reveals information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade secrets. (<i>See</i>	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's trade secrets.	Redacted version of Exhibit proposed that may be filed publicly.	Defendants do not oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
	Firouzbakht Decl. ¶ 2).	(Firouzbakht Decl. ¶ 3).		
Exhibit 12 (ECF No. 490-13) to the Declaration of Randall E. Kahnke in Support of CommScope's Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490-1)	This Exhibit reveals information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade secrets. (See Firouzbakht Decl. ¶ 2).	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's trade secrets. (Firouzbakht Decl. ¶ 3).	Redacted version of Exhibit proposed that may be filed publicly.	Defendants do not oppose the motion to seal.
Exhibit 13 (ECF No. 490-14) to the Declaration of Randall E. Kahnke in Support of CommScope's	This Exhibit reveals information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery	Disclosure of this information would cause clearly defined and serious injury to CommScope	Redacted version of Exhibit proposed that may be filed publicly.	Defendants do not oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490-1)	Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade secrets. (<i>See</i> Firouzbakht Decl. ¶ 2).	because it would reveal confidential and non-public information about CommScope's trade secrets. (Firouzbakht Decl. ¶ 3).		
Exhibit 14 (ECF No. 490-15) to the Declaration of Randall E. Kahnke in Support of CommScope's Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490-1)	This Exhibit reveals information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade secrets. (<i>See</i>	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's trade secrets. (Firouzbakht Decl. ¶ 3).	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial	Defendants do not oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
	Firouzbakht Decl. ¶ 2).		risk of competitive injury.	
Exhibit 15 (ECF No. 490-16) to the Declaration of Randall E. Kahnke in Support of CommScope's Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490-1)	This Exhibit reveals information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade secrets. (See Firouzbakht Decl. ¶ 2).	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's trade secrets. (Firouzbakht Decl. ¶ 3).	Redacted version of Exhibit proposed that may be filed publicly.	Defendants do not oppose the motion to seal.
Exhibit 16 (ECF No. 490-17) to the Declaration of Randall E. Kahnke in Support of CommScope's	This Exhibit reveals information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery	Disclosure of this information would cause clearly defined and serious injury to CommScope	Redacted version of Exhibit proposed that may be filed publicly.	Defendants do not oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490-1)	Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade secrets. (<i>See</i> Firouzbakht Decl. ¶ 2).	because it would reveal confidential and non-public information about CommScope's trade secrets. (Firouzbakht Decl. ¶ 3).		
Exhibit 17 (ECF No. 490-18) to the Declaration of Randall E. Kahnke in Support of CommScope's Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490-1)	This Exhibit reveals information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade secrets. (<i>See</i>	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's trade secrets. (Firouzbakht Decl. ¶ 3).	Redacted version of Exhibit proposed that may be filed publicly.	Defendants do not oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
	Firouzbakht Decl. ¶ 2).			
Exhibit 19 (ECF No. 490-20) to the Declaration of Randall E. Kahnke in Support of CommScope's Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490-1)	This Exhibit reveals discovery information that has been designated Confidential under the Discovery Confidentiality Order (ECF No. 22) as well as confidential and non-public information about CommScope's trade secrets and CommScope's business practices and procedures. (Firouzbakht Decl. ¶ 2).	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal discovery information and requests that have been designated Confidential under the Discovery Confidentiality Order. (Firouzbakht Decl. ¶ 3).	Redacted version of Exhibit proposed that may be filed publicly.	Defendants do not oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
Exhibit 23 (ECF No. 490-24) to the Declaration of Randall E. Kahnke in Support of CommScope's Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490-1)	This Exhibit reveals information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade secrets. (<i>See</i> Firouzbakht Decl. ¶ 2).	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's trade secrets. (Firouzbakht Decl. ¶ 3).	Redacted version of Exhibit proposed that may be filed publicly.	Defendants do not oppose the motion to seal.

Exhibit 24 (ECF No. 490-25) to the Declaration of Randall E. Kahnke in Support of CommScope's Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490-1)	This Exhibit reveals information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade secrets. (<i>See</i> Firouzbakht Decl. ¶ 2).	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's trade secrets. (Firouzbakht Decl. ¶ 3).	Redacted version of Exhibit proposed that may be filed publicly.	Defendants do not oppose the motion to seal.
Expert Declaration of Dr. Daniel van der Weide (ECF No. 490-26) with Respect to Issues Raised in CommScope's Letter Motion to Compel Specific Hardware Discovery (ECF No. 490)	This Declaration reveals information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's trade secrets.	Redacted version of Declaration proposed that may be filed publicly.	Defendants do not oppose the motion to seal.

	CommScope's trade secrets. (<i>See</i> Firouzbakht Decl. ¶ 2).	(Firouzbakht Decl. ¶ 3).		
Declaration of Martin Zimmerman, Ph.D. (ECF No. 490-30) in Support of CommScope's Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490)	This Declaration reveals information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade secrets and CommScope's business practices and procedures. (<i>See</i> Firouzbakht Decl. ¶ 2).	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's trade secrets and CommScope's business practices and procedures. (Firouzbakht Decl. ¶ 3).	Redacted version of Declaration proposed that may be filed publicly.	Defendants do not oppose the motion to seal.
Exhibit 1 (ECF No. 490-31) to the Declaration of Martin Zimmerman, Ph.D. in Support of	This Exhibit reveals information that has been designated Confidential and/or Attorneys' Eyes Only	Disclosure of this information would cause clearly defined and serious injury to	The confidential information in this document is sufficiently pervasive so as to	Defendants do not oppose the motion to seal.

CommScope's Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490-30)	under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade secrets. (<i>See</i> Firouzbakht Decl. ¶ 2).	CommScope because it would reveal confidential and non-public information about CommScope's trade secrets. (Firouzbakht Decl. ¶ 3).	render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	
Exhibit 2 (ECF No. 490-32) to the Declaration of Martin Zimmerman, Ph.D. in Support of CommScope's Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490-30)	This Exhibit reveals information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade secrets. (<i>See</i> Firouzbakht Decl. ¶ 2).	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's trade secrets. (Firouzbakht Decl. ¶ 3).	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	Defendants do not oppose the motion to seal.
CommScope's December 8, 2021 Letter Request to	Document references discovery material that has been designated as	Possible injury and prejudice to Rosenberger's	Redacted version proposed that may be filed publicly.	Plaintiff does not oppose the motion to seal.

<p>Compel Discovery (ECF No. 490):</p> <p>Pages 2-4, 6-11, 13, 15-18, 20-29</p>	<p>Confidential or Attorneys' Eyes Only and contains confidential and personally and commercially sensitive information about Rosenberger's employees and confidential and non-public information with respect to Rosenberger's business operations, including confidential and commercially sensitive information about Rosenberger's base station antenna design and development processes. (See Liu Decl. ¶ 3.)</p>	<p>competitive standing in the base station antenna marketplace. (See Liu Decl. ¶ 3.)</p>		
<p>Declaration of Randy Kahnke in support of CommScope's December 8, 2021</p>	<p>Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only.</p>	<p>Possible injury and prejudice to Rosenberger's competitive standing in the base</p>	<p>Redacted version proposed that may be filed publicly.</p>	<p>Plaintiff does not oppose the motion to seal.</p>

Letter Request to Compel Discovery (ECF No. 490-1): Pages 6-7	(See Liu Decl. ¶ 3.)	station antenna marketplace. (See Liu Decl. ¶ 3.)		
Exhibit 2 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021 Letter Request to Compel Discovery (ECF No. 490-3)	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only. (See Liu Decl. ¶ 3-4.)	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (See Liu Decl. ¶¶ 3-4.)	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	Plaintiff does not oppose the motion to seal.
Exhibit 3 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only. (See Liu Decl. ¶ 3-4.)	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna	The confidential information in this document is sufficiently pervasive so as to render redaction	Plaintiff does not oppose the motion to seal.

Letter Request to Compel Discovery (ECF No. 490-4)		marketplace. (<i>See</i> Liu Decl. ¶¶ 3-4.)	unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	
Exhibit 4 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021 Letter Request to Compel Discovery (ECF No. 490-5)	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only. (<i>See</i> Liu Decl. ¶ 3-4.)	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (<i>See</i> Liu Decl. ¶¶ 3-4.)	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	Plaintiff does not oppose the motion to seal.

Exhibit 5 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021 Letter Request to Compel Discovery (ECF No. 490-6)	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only and contains non-public information with respect to Rosenberger's business operations, including confidential and commercially sensitive information about Rosenberger's base station antenna design and development processes. (<i>See</i> Liu Decl. ¶ 3-4.)	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (<i>See</i> Liu Decl. ¶¶ 3-4.)	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	Plaintiff does not oppose the motion to seal.
Exhibit 6 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021 Letter Request to Compel Discovery (ECF No. 490-7)	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only and contains non-public information with respect to Rosenberger's	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (<i>See</i> Liu Decl. ¶¶ 3-4.)	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the	Plaintiff does not oppose the motion to seal.

	business operations, including confidential and commercially sensitive information about Rosenberger's base station antenna design and development processes. (<i>See</i> Liu Decl. ¶ 3-4.)		entirety of the document would require redaction to prevent a substantial risk of competitive injury.	
Exhibit 7 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021 Letter Request to Compel Discovery (ECF No. 490-8)	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only and contains non-public information with respect to Rosenberger's business operations, including confidential and commercially sensitive information about Rosenberger's base station antenna design and development	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (<i>See</i> Liu Decl. ¶¶ 3-4.)	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	Plaintiff does not oppose the motion to seal.

	processes. (<i>See</i> Liu Decl. ¶ 3-4.)			
Exhibit 9 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021 Letter Request to Compel Discovery (ECF No. 490-10): Page 2	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only. (<i>See</i> Liu Decl. ¶ 3.)	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (<i>See</i> Liu Decl. ¶ 3.)	Redacted version proposed that may be filed publicly.	Plaintiff does not oppose the motion to seal.
Exhibit 10 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021 Letter Request to Compel Discovery (ECF No. 490-11): Pages 1-2, 4	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only. (<i>See</i> Liu Decl. ¶ 3.)	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (<i>See</i> Liu Decl. ¶ 3.)	Redacted version proposed that may be filed publicly.	Plaintiff does not oppose the motion to seal.

Exhibit 11 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021 Letter Request to Compel Discovery (ECF No. 490-12)	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only and contains non-public information with respect to Rosenberger's business operations, including confidential and commercially sensitive information about Rosenberger's base station antenna design and development processes. (<i>See</i> Liu Decl. ¶ 3-4.)	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (<i>See</i> Liu Decl. ¶¶ 3-4.)	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	Plaintiff does not oppose the motion to seal.
Exhibit 12 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021 Letter Request to Compel Discovery (ECF No. 490-13)	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only and contains non-public information with respect to Rosenberger's	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (<i>See</i> Liu Decl. ¶¶ 3-4.)	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the	Plaintiff does not oppose the motion to seal.

	business operations, including confidential and commercially sensitive information about Rosenberger's base station antenna design and development processes. (<i>See</i> Liu Decl. ¶ 3-4.)		entirety of the document would require redaction to prevent a substantial risk of competitive injury.	
Exhibit 13 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021 Letter Request to Compel Discovery (ECF No. 490-14)	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only and contains non-public information with respect to Rosenberger's business operations, including confidential and commercially sensitive information about Rosenberger's base station antenna design and development	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (<i>See</i> Liu Decl. ¶¶ 3-4.)	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	Plaintiff does not oppose the motion to seal.

	processes. (<i>See</i> Liu Decl. ¶ 3-4.)			
Exhibit 15 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021 Letter Request to Compel Discovery (ECF No. 490-16)	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only and contains non-public information with respect to Rosenberger's business operations, including confidential and commercially sensitive information about Rosenberger's base station antenna design and development processes. (<i>See</i> Liu Decl. ¶ 3-4.)	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (<i>See</i> Liu Decl. ¶¶ 3-4.)	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	Plaintiff does not oppose the motion to seal.
Exhibit 16 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021 Letter Request to	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only and contains non-public information	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and	Plaintiff does not oppose the motion to seal.

Compel Discovery (ECF No. 490-17)	with respect to Rosenberger's business operations, including confidential and commercially sensitive information about Rosenberger's base station antenna design and development processes. (See Liu Decl. ¶ 3-4.)	marketplace. (See Liu Decl. ¶¶ 3-4.)	unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	
Exhibit 17 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021 Letter Request to Compel Discovery (ECF No. 490-18)	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only and contains non-public information with respect to Rosenberger's business operations, including confidential and commercially sensitive information about Rosenberger's base station antenna design and	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (See Liu Decl. ¶¶ 3-4.)	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	Plaintiff does not oppose the motion to seal.

	development processes. (<i>See</i> Liu Decl. ¶ 3-4.)			
Exhibit 18 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021 Letter Request to Compel Discovery (ECF No. 490-19)	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only and contains non-public information with respect to Rosenberger's business operations, including confidential and commercially sensitive information about Rosenberger's base station antenna design and development processes. (<i>See</i> Liu Decl. ¶ 3-4.)	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (<i>See</i> Liu Decl. ¶¶ 3-4.)	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	Plaintiff does not oppose the motion to seal.
Exhibit 19 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only and contains	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna	Redacted version proposed that may be filed publicly.	Plaintiff does not oppose the motion to seal.

Letter Request to Compel Discovery (ECF No. 490-20): Pages 2-12, 20-21, 26	confidential and non-public information with respect to Rosenberger's business operations, including confidential and commercially sensitive information about Rosenberger's base station antenna design and development processes. (See Liu Decl. ¶ 3.)	marketplace. (See Liu Decl. ¶ 3.)		
Exhibit 21 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021 Letter Request to Compel Discovery (ECF No. 490-22): Pages 2-3, 5-11	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only and contains confidential and non-public information with respect to Rosenberger's business operations, including confidential and commercially sensitive information	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (See Liu Decl. ¶ 3.)	Redacted version proposed that may be filed publicly.	Plaintiff does not oppose the motion to seal.

	about Rosenberger's base station antenna design and development processes. (<i>See</i> Liu Decl. ¶ 3.)			
Exhibit 22 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021 Letter Request to Compel Discovery (ECF No. 490-23): Page 1	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only. (<i>See</i> Liu Decl. ¶ 3.)	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (<i>See</i> Liu Decl. ¶ 3.)	Redacted version proposed that may be filed publicly.	Plaintiff does not oppose the motion to seal.
Exhibit 23 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021 Letter Request to Compel Discovery (ECF No. 490-24):	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only and contains confidential and personally and commercially sensitive information about	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (<i>See</i> Liu Decl. ¶ 3.)	Redacted version proposed that may be filed publicly.	Plaintiff does not oppose the motion to seal.

Pages 2-3, 5-6	Rosenberger's employees and confidential and non-public information with respect to Rosenberger's business operations, including confidential and commercially sensitive information about Rosenberger's base station antenna design and development processes, and Rosenberger's strategic business decisions. (<i>See</i> Liu Decl. ¶ 3.)			
Exhibit 24 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021 Letter Request to Compel Discovery (ECF No. 490-25):	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only. (<i>See</i> Liu Decl. ¶ 3.)	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (<i>See</i> Liu Decl. ¶ 3.)	Redacted version proposed that may be filed publicly.	Plaintiff does not oppose the motion to seal.

Pages 1-2				
<p>Expert Declaration of Dr. Daniel van der Weide (ECF No. 490-26):</p> <p>Pages 2, 7-8, 13-18, 24, 31-33</p>	<p>Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only and contains confidential and personally and commercially sensitive information about Rosenberger's employees and confidential and non-public information with respect to Rosenberger's business operations, including confidential and commercially sensitive information about Rosenberger's base station antenna design and development</p>	<p>Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (<i>See</i> Liu Decl. ¶ 3.)</p>	<p>Redacted version proposed that may be filed publicly.</p>	<p>Plaintiff does not oppose the motion to seal.</p>

	processes. (<i>See</i> Liu Decl. ¶ 3.)			
Exhibit 2 to the Declaration of Dr. Daniel van der Weide (ECF No. 490-28)	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only and contains confidential and personally and commercially sensitive information about Rosenberger's employees and confidential and non-public information with respect to Rosenberger's business operations, including confidential and commercially sensitive information about Rosenberger's base station antenna design and development processes, and Rosenberger's	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (<i>See</i> Liu Decl. ¶¶ 3-4.)	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	Plaintiff does not oppose the motion to seal.

	strategic business decisions. (<i>See</i> Liu Decl. ¶ 3-4.)			
Exhibit 3 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021 Letter Request to Compel Discovery (ECF No. 490-29)	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only and contains non-public information with respect to Rosenberger's business operations, including confidential and commercially sensitive information about Rosenberger's base station antenna design and development processes. (<i>See</i> Liu Decl. ¶ 3-4.)	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (<i>See</i> Liu Decl. ¶¶ 3-4.)	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	Plaintiff does not oppose the motion to seal.

III. Documents *previously sealed* and submitted in connection with Rosenberger’s Letter Opposition to CommScope Letter Motion to Compel (ECF No. 495).

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
<p>Rosenberger’s Letter Opposition to CommScope Letter Motion to Compel (ECF No. 495): at 2-3, 8, 10-11</p> <p>Exhibit A (ECF No. 495-2) to the Declaration of John Lu in Support of Rosenberger’s Opposition to CommScope’s Motion to Compel (ECF No. 495-1)</p>	Subject to the Court’s Sealing Order, ECF No. 499, granting the parties’ Joint Motion to Seal Pursuant to L. Civ. R. 5.3, ECF No. 493.			
Rosenberger’s Letter Opposition to CommScope Letter Motion to Compel	Subject to the Court’s Sealing Order, ECF No. 487, granting Joint Motion to Seal Pursuant to L. Civ. R. 5.3, ECF No. 472. <i>See also</i> Consolidated Index in Support of the Joint Motion to Seal, ECF No. 472-3 (moving to seal transcript of the Deposition of Dr. van der Weide).			

<p>(ECF No. 495): at 16-17</p> <p>Exhibit I (ECF No. 495-10) to the Declaration of John Lu in Support of Rosenberger's Opposition to CommScope's Motion to Compel (ECF No. 495-1)</p>	
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IV. Documents submitted in connection with Rosenberger's Letter Opposition to CommScope Letter Motion to Compel (ECF No. 495).

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
Rosenberger's Letter Opposition to CommScope Letter Motion to Compel (ECF No. 495): at 14	These portions of the Letter reveal information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would	Redacted version of Letter proposed that may be filed publicly.	Defendants do not oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
	Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's business practices and procedures. (<i>See</i> Firouzbakht Decl. ¶ 2).	reveal confidential and non-public information about CommScope's business practices and procedures. (Firouzbakht Decl. ¶ 3).		
Rosenberger's Letter Opposition to CommScope Letter Motion to Compel (ECF No. 495): at 14 n.7	These portions of the Letter reveal information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's trade secrets.	Redacted version of Letter proposed that may be filed publicly.	Defendants do not oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
	secrets. (<i>See</i> Firouzbakht Decl. ¶ 2).	(Firouzbakht Decl. ¶ 3).		
Exhibit D (ECF No. 495-5) to the Declaration of John Lu in Support of Rosenberger's Opposition to CommScope's Motion to Compel (ECF No. 495-1)	This Exhibit reveals information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade secrets. (<i>See</i> Firouzbakht Decl. ¶ 2).	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's trade secrets. (Firouzbakht Decl. ¶ 3).	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	Defendants do not oppose the motion to seal.
Exhibit E (ECF No. 495-6) to the Declaration of John Lu in Support of Rosenberger's	This Exhibit reveals information that has been designated Confidential and/or Attorneys' Eyes Only	Disclosure of this information would cause clearly defined and serious injury to	The confidential information in this document is sufficiently pervasive so as to	Defendants do not oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
Opposition to CommScope's Motion to Compel (ECF No. 495-1)	under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade secrets. (<i>See</i> Firouzbakht Decl. ¶ 2).	CommScope because it would reveal confidential and non-public information about CommScope's trade secrets. (Firouzbakht Decl. ¶ 3).	render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	
Exhibit F (ECF No. 495-7) to the Declaration of John Lu in Support of Rosenberger's Opposition to CommScope's Motion to Compel (ECF No. 495-1)	This Exhibit reveals information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's trade secrets.	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to	Defendants do not oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
	secrets. (<i>See</i> Firouzbakht Decl. ¶ 2).	(Firouzbakht Decl. ¶ 3).	prevent a substantial risk of competitive injury.	
Exhibit G (ECF No. 495-8) to the Declaration of John Lu in Support of Rosenberger's Opposition to CommScope's Motion to Compel (ECF No. 495-1)	This Exhibit reveals information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's business practices and policies. (<i>See</i> Firouzbakht Decl. ¶ 2).	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's business practices and policies (Firouzbakht Decl. ¶ 3).	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	Defendants do not oppose the motion to seal.
Exhibit H (ECF No. 495-9) to the Declaration of John	This Exhibit reveals information that has been designated	Disclosure of this information would cause clearly	Redacted version of Exhibit proposed	Defendants do not oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
Lu in Support of Rosenberger's Opposition to CommScope's Motion to Compel (ECF No. 495-1)	Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade secrets. (<i>See</i> Firouzbakht Decl. ¶ 2).	defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's trade secrets. (Firouzbakht Decl. ¶ 3).	that may be filed publicly.	
Exhibit J (ECF No. 495-11) to the Declaration of John Lu in Support of Rosenberger's Opposition to CommScope's Motion to Compel (ECF No. 495-1)	This Exhibit reveals information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's trade	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would	Defendants do not oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
	CommScope's trade secrets. (<i>See</i> Firouzbakht Decl. ¶ 2).	secrets. (Firouzbakht Decl. ¶ 3).	require redaction to prevent a substantial risk of competitive injury.	
Exhibit K (ECF No. 495-12) to the Declaration of John Lu in Support of Rosenberger's Opposition to CommScope's Motion to Compel (ECF No. 495-1)	This Exhibit reveals information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade secrets. (<i>See</i> Firouzbakht Decl. ¶ 2).	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's trade secrets. (Firouzbakht Decl. ¶ 3).	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	Defendants do not oppose the motion to seal.
Rosenberger's December 20, 2021 Letter in Opposition	Document references discovery material that has been designated as	Possible injury and prejudice to Rosenberger's	Redacted version proposed that may be filed publicly.	Plaintiff does not oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
<p>to CommScope's Request to Compel Discovery (ECF No. 495):</p> <p>Pages 1-4, 6-13, 15-17</p>	<p>Confidential or Attorneys' Eyes Only and contains confidential and personally and commercially sensitive information about Rosenberger's employees and confidential and non-public information with respect to Rosenberger's business operations, including confidential and commercially sensitive information about Rosenberger's base station antenna design and development processes. (See Liu Decl. ¶ 3.)</p>	<p>competitive standing in the base station antenna marketplace. (See Liu Decl. ¶ 3.)</p>		

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
Declaration of Cai Lishao in support of Rosenberger's December 20, 2021 Opposition to CommScope's Request to Compel Discovery (ECF No. 495-3): Pages 3-5	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only and contains non-public information with respect to Rosenberger's business operations, including confidential and commercially sensitive information about Rosenberger's base station antenna design and development processes. (See Liu Decl. ¶ 3.)	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (See Liu Decl. ¶ 3.)	Redacted version proposed that may be filed publicly.	Plaintiff does not oppose the motion to seal.
Exhibit C to the Declaration of John Lu in support of Rosenberger's	Document references discovery material that has been designated as Confidential or	Possible injury and prejudice to Rosenberger's competitive	Redacted version proposed that may be filed publicly.	Plaintiff does not oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
<p>December 20, 2021 Opposition to CommScope's Request to Compel Discovery (ECF No. 495-4):</p> <p>Page 2</p>	<p>Attorneys' Eyes Only. (See Liu Decl. ¶ 3.)</p>	<p>standing in the base station antenna marketplace. (See Liu Decl. ¶ 3.)</p>		
<p>Exhibit H to the Declaration of John Lu in support of Rosenberger's December 20, 2021 Opposition to CommScope's Request to Compel Discovery (ECF No. 495-9)</p>	<p>Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only and contains non-public information with respect to Rosenberger's business operations, including confidential and commercially sensitive information about Rosenberger's</p>	<p>Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (See Liu Decl. ¶¶ 3-4.)</p>	<p>The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial</p>	<p>Plaintiff does not oppose the motion to seal.</p>

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
	base station antenna design and development processes. (<i>See</i> Liu Decl. ¶ 3-4.)		risk of competitive injury.	